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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.

23 UBER TECHNOLOGIES, INC.;  
24 OTTOMOTTO LLC; OTTO TRUCKING  
25 LLC,

26 Defendants.

27 **DECLARATION OF FELIPE  
28 CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL DECLARATION OF  
LAMBERTUS HESSELINK IN SUPPORT  
OF WAYMO'S STATEMENT IN  
RESPONSE TO COURT'S QUESTIONS  
REGARDING TRADE SECRET NUMBER  
96**

1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal Declaration of Lambertus Hesselink in Support of Waymo’s Statement in Response to Court’s  
 8 Questions Regarding Trade Secret Number 96 (“Hesselink Declaration”), filed concurrently herewith  
 9 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following  
 10 materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Hesselink Declaration	Entire document	Waymo and Defendants

14       3. Specifically, the entirety of the Hesselink Declaration contains or refers to trade secret  
 15 information, which Waymo seeks to seal.

16       4. The entirety of the Hesselink Declaration contains, references, and/or describes  
 17 Waymo’s trade secrets, including as misappropriated by Defendants. The information Waymo seeks  
 18 to seal includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle  
 19 system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade  
 20 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to  
 21 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s  
 22 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle  
 23 system. If such information were made public, I understand that Waymo’s competitive standing  
 24 would be significantly harmed.

25       5. Waymo’s request to seal is narrowly tailored to those portions of the Hesselink  
 26 Declaration that merit sealing.

1       6. Waymo additionally seeks to seal the entirety of the Hesselink Declaration because  
2 Waymo believes it contains information is considered confidential or non-public by Defendants.  
3

4       I declare under penalty of perjury under the laws of the State of California and the United  
5 States of America that the foregoing is true and correct, and that this declaration was executed in San  
6 Francisco, California, on September 5, 2017.

7       By */s/ Felipe Corredor*  
8                   Felipe Corredor  
9                   Attorneys for WAYMO LLC  
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11

12                   **SIGNATURE ATTESTATION**

13       Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
14 filing of this document has been obtained from Felipe Corredor.

15                   */s/ Charles K. Verhoeven*  
16                   Charles K. Verhoeven  
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